

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT**

In Re:)	
)	
RONALD WILLIAM MOORE,)	Case No. 14-49556-399
)	
)	Chapter 7
Debtor.)	

APPLICATION TO EMPLOY SPECIAL COUNSEL

COMES NOW Trustee, Tracy A. Brown ("Trustee") and for her Application to Employ Counsel respectfully states as follows:

1. Trustee desires to employ Eric C. Peterson and the Law Office of Spencer Fane, LLP for the purpose of providing Trustee legal services necessary for the administration of this Estate.

2. Trustee states that she requires the assistance of legal counsel to represent her with respect to issues arising out of transactions connected to the Debtor's transfer of property, which may include but not be limited to the following:

- (a) Collection of property of the estate;
- (b) Necessary legal procedures in further discovery of assets; and
- (c) Preparation of legal notices as may be required.

3. Specifically, Trustee is in need of an attorney to:

- (a) Investigate causes of action arising from the Debtor's non-disclosure of certain assets and pre-bankruptcy asset transfers;
- (b) Assist in filing actions to recover property under 11 U.S.C. §§544, 547, 548, or other applicable provisions of the Bankruptcy Code, or state law;
- (c) Filing actions to determine and recover the Estate's interest in real estate;

(d) Taking such other and further steps as are necessary, reasonable or required to maximize the Estate; and

(e) Provide such other advice and assistance on matters which may arise regarding Debtor's real estate during the administration of this estate.

4. Trustee states that she has reason to believe that Debtor has assets which may be liquidated for the benefit of unsecured creditors.

5. The hourly rate of Eric C. Peterson is \$395. This rate is competitive with those charged by other law firms in St. Louis for services comparable to those to be provided by Spencer Fane, LLP. Spencer Fane, LLP's billing rates are adjusted from time to time.

6. The hourly rates of those associates and partner of Spencer Fane, LLP who are to be involved in this case range from \$180 to \$340 per hour for junior associates to \$220 to \$610 for senior attorneys. The hourly rates for those legal assistants to be involved in this case range from \$80 to \$150 per hour. These rates are the same as rates generally charged for services rendered in all matters handled by Spencer Fane, LLP and are competitive with those charged by other law firms in St. Louis for services comparable to those to be provided by Spencer Fane, LLP. Spencer Fane, LLP's billing rates are adjusted from time to time.

7. Trustee expects that Eric C. Peterson will be primarily responsible for this matter.

8. Trustee states that Eric C. Peterson is an experienced attorney, admitted to practice in the United States District Court, Eastern District of Missouri, and is capable of handling all matters for which Trustee would need to employ counsel.

9. Trustee states that Eric C. Peterson and Spencer Fane, LLP do not represent any interests adverse to the Trustee, to the Estate, to the U.S. Trustee and employees and his employment would be in the best interests of the Estate.

10. To the best of Trustee's knowledge, the above individual does not represent any interest adverse to Trustee, to the estate or to its creditors, is a disinterested person, and his employment would be to the best interests of the estate. Said attorney has no connection with the U.S. Trustee for this region and employees.

11. The application to employ counsel is made pursuant to the provisions of 11 U.S.C. §§327, 328 and 331.

WHEREFORE, Trustee prays that she be authorized to employ Eric C. Peterson and Spencer Fane, LLP for the purposes outlined above and that the Court's Order relate back to the earlier of the date of this application. Compensation of counsel shall be subject to notice and further Order of the Court.

The Law Office of Tracy A. Brown, P.C.

By: /s/
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was served either through the Court's ECF system or by regular mail this 6 day of October, 2015 on the following:

Ronald William Moore
Debtor
8300 Delmar, Unit 516
St. Louis, MO 63124

Robert A. Breidenbach
Attorney for Debtor
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St. Louis, MO 63101

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